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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

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6 STATE OF OKLAHOMA,)

)

7 Plaintiff,)

)

8 vs.) Case No. 05-CV-0329

)

9 TYSON FOODS, INCORPORATED,)

ET AL.,)

10)

Defendants.)

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14 VIDEOTAPED DEPOSITION OF TIM JONES

15 TAKEN ON BEHALF OF THE DEFENDANT(S)

16 IN TULSA, OKLAHOMA

17 ON APRIL 10, 2009

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25 REPORTED BY: ROSIE STANDRIDGE, CSR

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1 A P P E A R A N C E S

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For the Plaintiff:

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Patrick H. Green

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Riggs, Abney, Neal, Turpen,

Orbison & Lewis, PC

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502 West Sixth Street

Tulsa, Oklahoma 74119-1010

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7 For Cargill, Inc. and Cargill Turkey Production, LLC:

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Theresa Noble Hill

Rhodes, Hieronymus, Jones

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Tucker & Gable, PLLC

ONEOK Plaza

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100 W. 5th Street

Suite 400

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Tulsa, Oklahoma 74103-4287

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Also present:

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Mr. Wayne Neil, Videographer

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1 (Exhibits 1 & 2 marked)

2 THE VIDEOGRAPHER: We are on the record.

3 Today is April 10th, 2009. This is the beginning of

4 the videotaped deposition of Tim Jones in the United

5 States Court for the Northern District of Oklahoma;

6 State of Oklahoma versus Tyson Foods, Incorporated;

7 Case 05-CV-0329. My name is Wayne Neil, the

8 videographer. Our court reporter is Rosie Standridge.

9 Will the attorneys please introduce

10 themselves.

11 MS. HILL: Theresa Hill for Cargill, Inc.

12 and Cargill Turkey Production, LLC.

13 MR. GREEN: Pat Green for the State of

14 Oklahoma.

15 THE VIDEOGRAPHER: Would the court reporter

16 please swear in the witness.

17 TIM JONES,

18 after having been first duly sworn/affirmed at 8:37

19 a.m., deposes and says in reply to the questions

20 propounded as follows, to-wit:

21 EXAMINATION

22 BY MS. HILL:

23 Q. Mr. Jones, again, for the record, my name is

24 Theresa Hill. We met earlier this morning.

25 A. Uh-huh.

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1 Q. Okay. All right. Did you do anything to
2 establish whether there was any runoff from that
3 field?

4 A. I did not.

5 Q. Do you know, was there a name on this truck?

6 A. I don't remember; but if there was, I
7 probably would have written it down.

8 Q. Do you have any memories about this incident
9 about whether there was a particular landowner, grower
10 or company involved, any names?

11 A. I don't remember.

12 Q. Do you remember the names of any persons
13 involved in the activities that you observed in the
14 watershed?

15 A. No.

16 Q. Do you know who the defendants are in this
17 case?

18 A. Tyson Foods.

19 Q. During your work on this project, do you
20 recall receiving any information about any of the
21 defendants in this lawsuit?

22 A. No.

23 Q. Did you observe any activities of any of the
24 defendants in this lawsuit?

25 A. No.

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1 information did you gather to determine whether there
2 was actually any violation taking place -- of law
3 taking place?

4 MR. GREEN: Object to the form.

5 A. I had no knowledge of violation of law.

6 Q. (By Ms. Hill) So you did not do any further
7 investigation about this unusual activity you noted in
8 the field?

9 A. No.

10 Q. You didn't -- did not talk to any witnesses?

11 A. No.

12 Q. You didn't gather any other evidence?

13 A. No.

14 Q. And if you were to determine whether there
15 was indeed any type of violation of any law, you would
16 need to know what those laws were?

17 A. I would.

18 Q. One would need to interview witnesses?

19 A. Yes.

20 Q. And gather evidence?

21 A. Yes.

22 Q. So this isn't like the criminal
23 investigations that you do in your line of work for
24 the Tulsa Police Department?

25 A. No.